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June 10, 2024

**Via E-Filing**

Hon. Robert Kirsch  
 United States District Court  
 District of New Jersey  
 Clarkson S. Fisher Building & U.S. Courthouse  
 402 East State Street  
 Trenton, NJ 08608  
 Courtroom: 4E

Re: ***Roadtex Transportation, LLC v. Salvatore Della Donne, Robert J. Kelly, Jr., and High Road Transportation, LLC, Case No. 3:24-cv-04185-RK-RLS***

Dear Judge Kirsch:

This firm represents Plaintiff Roadtex Transportation, LLC (“Roadtex”) in the above-captioned matter. We write to respectfully request that the Court allow Roadtex additional time to respond to Defendants Robert J. Kelly Jr.’s and High Road Transportation, LLC’s (collectively “Defendants”) Pre-Motion Conference Letter regarding Defendants’ motion to dismiss. Specifically, Roadtex would like an extension to Friday, June 14, 2024 to file its letter response in opposition to Defendants’ Pre-Motion Conference Letter.

Counsel for Roadtex’s internal docketing system did not register that Your Honor’s Rules and Procedures required a response within seven (7) days after receipt of a letter requesting a Pre-Motion Conference, and it was unaware of Your Honor’s Judicial Preferences. Moreover, lead counsel for Roadtex, J. Scott Humphrey, whose *pro hac vice* admission is forthcoming, was on trial when Defendants’ counsel filed her letter for a Pre-Motion Conference. Accordingly, Roadtex’s counsel did not receive notice, and was unaware, of the response letter deadline.

Counsel for Roadtex respectfully requests that it be allowed until this Friday, June 14, 2024 to file its written letter response prior to the Pre-Motion Conference. This request will not prejudice Defendants nor will it improperly delay proceedings. Counsel for Roadtex informed Defendants’ counsel by e-mail that they were seeking this extension and to request her approval thereto.

Very truly yours,

BENESCH, FRIEDLANDER,  
 COPLAN & ARONOFF LLP

Daniel M. Meier